

POST OFFICE BOX 2180 • HOUSTON, TEXAS 77252-2180 ENVIRONMENTAL AND SAFETY DEPARTMENT

OPERATIONS INTEGRITY AND ENVIRONMENTAL RESPONSE SERVICES

J. K. HARRIS

RECEIVED

JAN - 5 1998

SUPERFUND DIVISION

January 5, 1998

RE: 104 Response PCB Treatment, Inc. Superfund Site Kansas City, Kansas and Kansas City, Missouri

Ms. Pauletta France-Isetts Superfund Division U. S. Environmental Protection Agency Region VII 726 Minnesota Avenue Kansas City, Kansas 66101

Registered Mail Return Receipt

Dear Ms. France-Isetts:

Attached is Exxon's response to your recent request for information. You may reach me at (713)-656-9213 if you have questions.

Attachment

Y:\winword\pcbtrtmt\104response.doc

C (with attachment):

D. J. Potvin

A. Bogard (ECA Linden)

J. W. Achee(w/o attachment)

2016669





QUESTIONS

1. Identify the person(s) answering these questions on behalf of Respondent.

These answers were prepared by J. Kyle Harris with the advice of counsel.

2. Identify the person to whom future correspondence regarding this matter should be directed.

Future correspondence may be directed to Mr. Harris. Items may be mailed to his attention at 800 Bell Street, Room 4111D, Houston, TX, 77002. His phone number is (713)-656-9213 and his fax number is (713)-656-9430.

3. For each and every question contained herein, identify all persons consulted in the preparation of the answer.

All answers shown were prepared by Mr. Harris.

4. Identify all names used by Respondent between 1982 and 1987.

Exxon Corporation is the current legal name. The information requested, while it may be appropriate for a closely held corporation makes no sense for an Exxon. Over its hundred-year history Exxon has had interests in thousands of businesses.

5. Identify all persons, including Respondent's current and former employees, who have or may have knowledge, information or documents about the generation, use, purchase, treatment, storage, disposal or other handling of materials, equipment or items at, or transportation of materials, equipment or items to the Sites.

No such persons have been identified to date.

6. Identify all persons with whom Respondent, Respondent's employees or other persons made any arrangements for transportation of materials, equipment or items taken to the Sites. For each transaction, describe the type of arrangements made and submit all documentation relating to such arrangements.

Exxon has found no indication in it's records of any such arrangements for transportation to the Sites. Documents provided to Exxon by S. D. Myers which indicate shipments to the Sites by S. D. Myers of materials that originated at an Exxon facility are attached.

7. Identify all persons with whom Respondent, Respondent's employees or other persons made any arrangements for the storage, treatment, or disposal of materials or items at the Sites. For each such transaction, describe the type of arrangement made and submit all documentation relating to such arrangement.

Exxon has found no indication in it's records of any such arrangements for storage, treatment or

disposal at the Sites. Documents provided to Exxon by S. D. Myers, which indicate shipments to the Sites by S. D. Myers of materials that originated at an Exxon facility are attached.

- 8. Provide copies of all documents including, but not limited to, invoices, contracts, receipts, manifests, certificates of disposal, shipping papers, service orders, and other documents, pertaining to Respondent's transportation of material, equipment or items, or arrangements for transportation or material, equipment or items, to PCB Treatment, Inc.:
 - a. Identify all documents pertaining to the transportation or arrangement for transportation of material, equipment or items to Wyandotte Street location;

No such documents have been identified to date.

b. Identify all documents pertaining to the transportation or arrangement for transportation of material, equipment or items to the Ewing Street location.

Exxon has found no indication in it's records of any such arrangements for transportation to the Sites. Documents provided to Exxon by S. D. Myers, which indicate shipments to the Sites by S. D. Myers of materials that originated at an Exxon facility are attached.

- 9. Provide copies of all documents including, but not limited to, invoices, contracts, receipts, manifests, certificates of disposal, shipping papers, service orders, and other documents pertaining to Respondent's arrangements for the storage, treatment or disposal of material, equipment or items at PCB Treatment, Inc.:
 - a. Identify all documents pertaining to the storage, treatment or disposal of material, equipment or items to the Wyandotte Street location;

No such documents have been identified to date.

b. Identify all documents pertaining to the storage, treatment or disposal of material, Equipment or items to the Ewing Street location.

Exxon has found no indication in it's records of any such arrangements for storage, treatment or disposal at the Sites. Documents provided to Exxon by S. D. Myers which indicate shipments to the Sites by S. D. Myers of materials that originated at an Exxon facility are attached.

10. Provide any information or knowledge in the possession of Respondent, its affiliates, contractors or agents, relating to PCB Treatment, Inc. (such as correspondence you may have received from other persons relating to PCB Treatment, Inc.).

Documents provided to Exxon by S. D. Myers which indicate shipments to the Sites by S. D. Myers of materials that originated at an Exxon facility are attached.

11. Provide any information or knowledge in the possession of Respondent relating to the handling or transportation of material, equipment or items between the Wyandotte Street and Ewing Street Sites by any person and the purpose for such movement of material, equipment or items between the Sites.

No such information has been identified to date

12. Identify all materials, equipment or items that were rejected from the Sites. For each material, equipment or item rejected from the Sites, state the reason for such rejection.

No such information has been identified to date.

13. State whether Respondent, Respondent's employees, contractors and/or agents, or other persons ever shipped any material, equipment or items to the Sites? If so, provide the following information for each material, equipment or item that was or may have been sent to the Sites:

Exxon has found no indication in it's records of any such arrangements for shipping to the Sites. Documents provided to Exxon by S. D. Myers which indicate shipments to the Sites by S. D. Myers of materials that originated at an Exxon facility are attached.

a. the type of material, equipment or item (i.e., transformer, capacitor, switch, etc.);

The only material indicated in the attached documents is oil.

b. the size of rating of the material, equipment or item;

See attached documents.

c. the name of the manufacturer and serial number;

See attached documents.

d. the total weight of the material, equipment, or items;

See attached documents.

e. the total weight of oil (in gallons, pounds, or kilograms) contained in the material, equipment or item, or the oil capacity of the material, equipment or item, and the method used to determine the amount of capacity.

See attached documents.

f. the type of oil or other fluid that was present or may have been present in such material, equipment or items at the time it was sent to the Sites;

See attached documents.

g. describe what steps were taken to determine whether the oil or fluid contained PCB at the time of removal from service or of disposal;

No such information has been located to date.

h. any and all documentation, including but not limited to, analytical data which indicates the concentration of PCBs contained in the oil or fluid;

No such information has been located to date.

the date on which the material, equipment or item left your facility;

See attached documents.

j. the time period during which the material, equipment or item remained at the Sites;

No such information has been located to date.

k. the name, address and telephone number of the transporter;

See attached documents.

I. if the material, equipment or item was owned by someone other than Respondent, identify the person owning such material, equipment or item; and

No such information has been located to date.

m. the name(s), address(es), telephone number(s), and date(s) of ownership of any and all prior owners, if any, of the material, equipment and item.

No such information has been located to date.

14. With respect to each shipment of oil to the Sites by tanker truck, in drums or any other method of shipment, provide:

See attached documents.

- a. the total amount of oil in gallons, pounds or kilograms contained in each shipment and the method of shipment or type of container used;
- b. the type of oil or fluid contained in each shipment;
- c. describe the steps taken to determine whether the oil or fluid contained PCBs at the time of shipment; and
- d. any and all documentation, including but not limited to, analytical data, that indicates the concentration of PCBs contained in the oil or fluid.
- 15. With respect to soil and debris shipped to the Sites, provide the following:

No such information has been located to date.

- a. a description of the constituents of the soil or debris shipped to the Sites;
- b. the total amount of soil or debris shipped to the Sites in pounds, cubic yards, cubic feet, or other type of measurement. Describe the type of measurement;
- c. describe the steps taken to determine whether the soil or debris contained PCBs at the time of shipment; and
- d. any and all documentation, including but not limited to, analytical data, that indicates

the concentration of PCBs contained in the soil or debris.

16. List the EPA RCRA Identification Numbers of Respondent, generators, broker, and/or transporters, if any, and identify the corresponding units, facilities or vessels assigned these numbers.

See attached documents

17. If you have reason to believe that there may be other persons, whether or not employed by Respondent, who may be able to provide a more detailed or complete response to any question or subpart of a question or who may be able to provide additional information or responsive documents, identify each such person and the additional information or documents that each may have.

No such persons have been identified.

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STITATOLI DILL OF LADING - SHORT FORM - ORIGINAL - NOT NEGOTIABLE

SECO, subject to the classifications and tarrifs in effect on th of the issue of this Bill of to: in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is

destination and as to each party at a enterested in all or any said property, that every service to be , all the bill of lading terms and conditions in the governing performed hereunder shall be subj. classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and

arrier		gent's h	S NO NO upnee— For purposes of notification only				
onsigned to	50	OP2 ABER ROAD, WILLIAMSBURG, OH 45		. State of		(County of
No.	HM	DESCRIPTION AND CLASSIFICATION Proper Shipping Name Class and	UN#	ehicle or Car Initi	Class	Check	No No
Packages	() ()	Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203	NA#	(Sub to Cor)	or Rate	Column	applicable bill of fading, if this shipment is to be delivered to the consigner with our recourse on the consigner, the con-
.3	<u> </u>	Waste polychlorinated biphenyl O	RM-E,	JN2315, RQ			signor shall sign the following statement: The carrier shall not make delivery of this shipment without payment of freigh
		transformer carcasses WORK ORDER	#2003	06 PURCHASI	ORDER		and all other lawful charges.
		NO 21025 WANTERSON NO 84 0227 W	ATT 72	TELD CEDUTA	er DIUIC	TON	(Signature of Consignor.)
		NO. 31925 MANIFEST NO. 86-0227-T	ALL F	TELD SERVIC	E DIVIS	TON	If charges are to be prepaid, write or stamp here, "To be Prepaid."
		(1) Avtex Fiber, Front Royal, VA	86-09	2 S/N 8311	8/5/86		
		16,770 lbs.					Received \$
		(4) Colum Boil, Columbiana, OH 8	6_055	7/5/86 //60	0 1he		Agent or Casher.
							Per
		S/N 2411009, S/N 2410780, S/N 24	11011,	S/N 671630	14		the amount prepard.)
		(1) Diam Bath, Corsicana, TX 001	36308	5/6/86 S/N	2790588		Charges Advanced:
		5,310 lbs.					C.O.D. SHIPMENT
							Prepad () Collect () \$
		(3) Exxon Col, Linden, NJ NJA019	4370 8.	29/86 14,7	60 lbs.		Callection Fee
		s/n 1794455, s/n 1794456, s/n 17	94457				*If the shipment moves heliusen two ports
		(3) Fibair, Reedsville, WV 86-06	2 6/30	86 3,300 1	bs.		by a carrier by water, the law requires that the bill of leding shall state whether it is "Carrier's or Shioper's weight."
		s/n B345297, S/n 867554 9, S/n C3	75087				1Shipper's imprint in feu of stamp; not a part of bit of leding approved by the Department of Transpurlation.
		(1) G.A.C., Akron, OH 86-606 7/7	/86 S/I	6909636 4	,250 lb	s.	NOTE — Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared
		DRAINED AND FLUSHED ORIGINAL CON	CENTRA	TION UNDER	500ppm		value of the property.
			1.	0.	- 1		THIS SHIPMENT IS CORRECTLY DE- SCRIBED. CORRECT WEIGHT IS
			Cu	9610	dec		LBS.
AL				12186			Subject to verification by the Re- spective Weighing and Inspection Bureau According to Agreement
ES				Selen		6	Per
thore containers theation and Ru	s used for mid He 5 of the Nai	s shomeni conform to the specifications set forth in the box maker's certificate the triangle Motor Freight Classification 15hoper's imprint in Neu of stamp not a part of the property of the	Heor Tha all di of bill of lading :	ther requirements of Hule approved by the Interstat	e Commerce Con	nmission	If lower charges result, the agreed or de- clared value of the within described con- tainers is hereby specifically stated to be
A.	1				Shippe	r, Per	not exceeding 50 cents per pound per article.
manufaction office	ce address of	Ishoper (John P. Wunderte)				1	This is to certify that the above-nar materials are properly classified, scribed, peckaged, marked and labe and are in proper condition for transp tation according to the applicable re- lations of the Department of Transpo-

orm No. 35-644H © , 1986 (ALCT) 190 Baldwin Ave., Jersey City, NJ 07306 - (800) 631-3098 - (201) 705 6400

Revised Summary of PCB Treatment, Inc., KS Loads

LOAD 5	•	9/23/86	DATE SHIPPED AVERAGE		MANIFEST: 86-0230			
Customer A. B. Exxon C. D. F. SDMI	`	Volume 660 726 2910 395 509	ppm PCBs 90 117 288 838 500		·	lb. PCBs 0.437 0.621 6.148 2.426 1.865		
		<u>5200</u>	<u>302</u>			<u>11.497</u>		
A Retro of PCB-	Gone, re	sults from jol	b folder.		OK			
ד	Cs:	36 11		ppm 89 15 167	nameplate gal 255 203 203			
B. Exxon, Lin Results from j			÷	ppm 154 112 84	OK nameplate gal 242 242 242			
C	ГСs:	5 6 7 8 12 13 14 20 22 23 24 30 33	386@1242 388@1242 290@1242 287@1242 141@1242 130@1242 144@1242 103@1242 111@1242 116@1242 122@1242 68@1260 106@1242	ppm 386 388 290 287 141 130 144 103 111 116 122 68 106	OK nameplate gal 603 603 603 81 81 81 81 81 81 81 81 81 81			

SDMI load was MR liquids. <500 ppm.

ring oppo Form designed for use of	on elite (12-pitch) tyc 3r.)	a.			Form	,	R No. 2000	0-0404. Expires 7-3
UNIFORM HAZARDOUS	1. Generator's US EPA ID OHD044946127		anifest Do	cument No.	2. Pa	age 1 Infor	mation in	the shaded area by Federal law.
S. Ger. arator's Name and Mailing Ad S. D. MYERS, INC.	dress				A Si	Ale Manifesti		
P.O. BOX 4724, AKRON 4. Generator's Phone (216) 63				:	ر اور اوا	(to constitute)	ે. શિ જ ઉપયુ	4.5
5. Transporter 1 Company Name "CHICAGO INDUSTRIAL WA		6. US EPA	ID Numb	er	CNO	ngirnisoni unscollereri	(a)Des	700
7. Transporter 2 Company Name			ID Numb	er	ESS	ie/Iranspori	reiD.	14.36 TELES
Designated Facility Name and Site PCB, INC.	e Address	10. US EPA	ID Numb	er				
. 45 EWING STREET KANSAS CITY, KS 66108	3 1	KSD980963	565				10	
11. US DOT Description (Including PI				12. Conta	ners Type	13. Total Quantity	14. Unit Wt/Vol	Wile No-
Waste polychlori RQ transformer o		ORM-E, UN2:	315,	1	т	5,200	G	
o. COAS	5 Done	2						
c.								
d.	1		•					
15. Special Handling Instructions an	d Additional Information							
PURCHASE ORDER # 16. GENERATOR'S CERTIFICATION shipping name and are classified to applicable international and result of the section 3002(b) of RCRA, I have determined to be economy which minimizes the present and	FS32694 I: I hereby declare that the control packed, marked, and latational government regular terator who has been exem also certify that I have a lically practicable and I had a second to the control packed and I had a second to the control packed to the contro	beled, and are in tions. Inpted by statute or program in place the receiver the re	all respector regulation to reduce nethod of	ts in proper n from the d the volume	conditi uty to r and to	ion for transp make a waste kicity of waste	ort by hig minimiza generate	thway according tion certification ed to the degree
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18. Transporter 2 Acknowledgemen Printed/Typed Name	t of Receipt of Materials	Signature	3					Month Day Ye
19. Discrepancy Indication Space		<u>-</u> l						
20. Facility Owner or Operator: Certi	fication of receipt of hazar	rdous materials o		this manifes	st exce	pt as noted in		Month Day Ye
PCB INC. M	ike Yorun	4- Signatur	<u>m</u> .	9.4	المناث	<u></u>		9 12418
=15R-6 Labelmaster, Div. of American	n Labelmark Co. Inc. 60646	M	,	ر ريه	A Form (8700-22 (Rev. 4	-85) Previo	us edition is obsol

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UNLCO 190 Baldwin Ave., Jersey City, NJ 07306 - (800) 631-3098 - (201) 795-5400

STRAIGHT BILL OF LADING — SHORT FORM — ORIGINAL — NOT NEGOTIABLE

ECEIVED, subject to the classifications and samis in effect on the date of the issue of this fill of Liding, the property described below in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated below which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of, said property over all or any portion of said route to

destination and as to each party at any time interested in all or any said property, that every service to it performed hereunder shall be subject to all the bill of lading terms and condisons in the governir classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in it governing classification and line said terms and conditions are hereby agreed to by the shipper an accepted for himself and his assigns.

From S. I							
At180_SC	OUTH A	VE., TALLMADGE, OH 44278	BY T	DESIGNATE WITH A RUCK 20 FREI	W(X) GHT () SI	hipper's	i No
Carrier							No
Consigned to _	PCB,	INC.	 _	(Ma	d or street addre	ess of con-	ugnee— For purposes of notification only
Destination				_ State of	 	0	County of
Route 45	EWING	STREET, KANSAS CITY, KS 66108					
Delivering Carr	ier	·	·	/ehicle or Car init	ial		No
No Packages	НМ	DESCRIPTION AND CLASSIFICATION Proper Shipping Name, Class and Identification Number per 172.101, 172.202, 172.203	UN # Of NA#	"Weight (Sub to Cor.)	Class or Rate	Check Column	Subject to Section 7 of conditions of applicable bill of lading, if this shipmer as to be delivered to the consigner with
tanker		Waste polychlorinated biphenyl C	RM∸E,	UN2315, RQ			out recourse on the consignor, the cor signor shall sign the following statement. The carrier shall not make delivery it this shipment without payment of kneigh
		WORK ORDER #86-3846 MANIFEST #86	-0230	PURCHASE O	RDER		and all other lawful charges
		NUMBER FS32694 5,200 gallons		<u> </u>			(Signature of Consignor) If charges are to be prepaid, write of
337/1242		₹(660 gallons) Amoco Chemical, Jo	liet,	IL IL16282	55 8/15	86 P	stamp here, "To be Prepaid."
>60/1260		(726 gallons) Exxon, Linden, NJ	NJA019	4370 8/29/	86 FS		Received 8 to apply in prepayment of the charges of
144/1242	•	(565 gallons) Jasper Co., Renssl	ear, I	N 86-106 9	/5/86 F		Agent or Cashier
750/1242	_ @	(2,345 gallons) Jasper Co., Rens	slera,	IN 86-108	9/4/86	FS	Per
21243 808 Ben	•	(395 gallons) Liqui-Box, Ashland	, он 8	6-054 8/30	/86 FS		Charges Advanced
		(509 gallons) S.D. Myers, Inc.,	Akron,	OH LB 9/1	9/86 LB		C.O.D. SHIPMENT
			Ø5	P GR			Collect () \$
							*K the shipment moves between two port
			60 TO		A 8		by a carrier by water, the law requires the the bill of lading shall state whether it is "Carrier's or Shipper's weight."
							1Shipper's imprint in lieu of stamp; not part of bill of lading approved by the Department of Transportation.
		All Andrews					NOTE — Where the rate is dependent or value, shippers are required to state specification in writing the agreed or declare value of the property.
		destruction	F-1 23				THIS SHIPMENT IS CORRECTLY DE SCRIBED, CORRECT WEIGHT IS
		follow				-	Subject to verification by the fle spective Weighing and Inspection
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EPA ID MOD#980633044

P.C.B., INC. OF MISSOURI



Certificate of Destruction

P.C.E	3., Inc. Of Missouri has destroyed waste receiv-
ed fro	om s.d. myers
as ide	entified in hazardous Waste Manifest #
and I	hereby certifies such destruction as of this
29th	day of198 6
Generator .	S.D. Myers By A.C. Schamel
Address	2737 Front Title President
	Cuyahoga Falls, Ohio 44224